

**TELEPHONE  
RECORD OF  
COMMUNICATION  
(TCR)**

☒ Phone

☐ Discussion

☐ Conference

☐ Field Trip

☐ Other (specify) \_\_\_\_\_

(Record of item checked above)

To: File

From: Deborah  
Bredehoft

Date: 7/23/14

Subject: TPI Iowa

**Summary of Communication:**

I spoke with Mr. Dave Lloyd (401-247-4096/401-578-8964).

1. Regarding the container that was identified during the inspection as an accumulation container rather than as a satellite accumulation container
  - The container is no longer located where it was previously managed during the time of the inspection.
  - The container in the picture, provided by TPI on 6/25/14, is the new satellite accumulation container.
  - Within the photo – the long wall on the left is the paint booth. The door to the paint booth is to the left of the box marked “paint.” The red and blue drum next to the paint booth are products. The machine next to the red and blue drum is the paint distributor. The supervisor’s desk is to the right of the door (between the “paint” box and the container).
  - The container receives waste from equipment clean out.
  - The operators are people assigned to the department – they could be painting across 3 shifts or only doing touch up.
  - The windmill blades enter at the far end of the picture and come towards the camera in the process.
  - Painting is a constant and there are always painters in the area.
2. Training Plan Discussion:
  - Need the duties for each job description – Mr. Lloyd pointed me towards EHS-010 (Hazardous Waste Management and Disposal Plan) within the “One Plan” that outlined “Job Category Descriptions.”
  - Need names of each employee for each job description that includes hazardous waste management – I discussed this requirement with Mr. Lloyd and explained that TPI needed some tracking method that outlined the names of the individuals for each job description. He was concerned that this list could change on a routine basis. I explained that the list didn’t need to be part of the contingency plan, but he did need to maintain this information and be able to provide it as part of their training plan.
  - In addition to education and experience requirements listed, are there any skills or qualifications needed for these positions? Mr. Lloyd said that there are no additional skill or qualifications needed for these positions.
  - Update training plan to state how often RCRA hazardous waste training is provided. Additionally, is the annual refresher training a review of the initial training? Mr. Lloyd stated that he is at the facility on approximately a monthly basis and does training each time that he is there for anyone that needs training. He stated that the annual training is the same as the initial training.

RCRA



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### 3. Contingency Plan –

- Emergency Equipment:
  - The list of emergency equipment did not specifically outline that the capabilities were provided – Discussed with Mr. Lloyd. Stated that he should ensure that capabilities are included and if capabilities are already included, then the table should be relabeled to state as such.
  - The list if emergency equipment needed to include location, description, and capabilities of sprinkler system, external communication system, and booms (discussed immediately below chart of information, but no information provided) – Discussed with Mr. Lloyd.
  - Do they have any decontamination equipment? If so, needs to be listed with location, description, and capabilities – Mr. Lloyd stated that they did not have any decontamination equipment.
  - Eye wash stations are listed on map, but not included on the chart of emergency equipment – Mr. Lloyd stated that the eye washes are mobile and used in a corrosive area. I suggested that he list this within the emergency equipment and state that the location is variable (based on location of corrosive process).
  - The list of emergency equipment in the contingency plan portion of the one plan does not match up with the earlier table that includes the descriptions and locations (and needs to also include capabilities) – Mentioned to Mr. Lloyd, but stated that as long as one table has all the information, it would appear to meet the regulations.
- Contact Information for Emergency Coordinators – Plan lists home and mobile phones. However, regulations discussing needing office and home. Are the mobile phone numbers their work numbers or do they have additional work numbers? – Discussed with Mr. Lloyd. He stated that they may have office numbers, but would be more likely to use a mobile number. I stated that the office lines should be included to comply with the regulations. However, I suggested that TPI could also include a statement that says that the best way to reach the emergency coordinators is via their mobile phones rather than their “work” or “office” phone numbers.
- Describe signal that will be used to begin evacuation – need additional information beyond “an alarm will sound” – need to describe the alarm (high pitch continuous sound, mid-range series of 3 short beeps, etc.) – Mr. Lloyd stated that the same alarm is used for every emergency and they do not have a separate type of alarm for each type of emergency. Mr. Lloyd also stated that the alarm signal was discussed in detail in the plan.
- Descriptions of actions employees must take in response to emergencies (fires and explosions):
  - Need information on how to respond to explosion
  - Need information on when employees evacuate in response to a fire
    - I spoke with Mr. Lloyd about this and he said that their general policy is to have the employees report the matter and then evacuate. I suggested that they write this into their contingency plan.
- Description of arrangements with local emergency agencies – I spoke with Mr. Lloyd about this section. He stated that he had included the signed letters by the local authorities outlining that the local authorities had received the plan and understood the plan was adequate. I explained that the plan needed to include what those local authorities would do (i.e., the fire department would fight a fire, the police would provide a perimeter, etc.).

At the end of the phone call, Mr. Lloyd expressed concern over submitting the plan to the local authorities each time a revision was made. I said I would look into this and let him know if any change required that the plan be resubmitted to local authorizes.